



VIA EMAIL AND U.S. MAIL

August 29, 2019

Caroline Haskins
MuckRock News
Department MR 78789
411A Highland Ave.
Somerville, MA 02144
78789-42080781@requests.muckrock.com

Re: California Records Act Request, Received August 20, 2019
(PRA ID# 19-233)

Dear Ms. Haskins,

This office serves as City Attorney for the City of Commerce (“City”), and we write on the City’s behalf in response to your California Public Records Act (“PRA” or “Act”) request seeking electronic copies of records:

“...related to the Ring Promotional Discount Agreement:

1. All calendar invitations, instructional materials, presentations and presentation materials (including recorded video and audio, PowerPoint files, prepared remarks, and slides formats), and other documents that mention Ring devices and/or the Neighbors app. This includes A) any minutes/notes taken during meetings that discussed the use of Ring devices and/or the Neighbors app, B) any explanations (whether internally or externally generated) of how Ring devices and/or the Neighbors app work, and C) any other document that has been used to help explain the use, marketing, or promotion of Ring devices and/or the Neighbors app to any party, including internal documentation, public relations materials, and executive summaries.
2. A copy of any privacy impact assessments, use policies, standard operating procedures, data retention policies, legal opinions, warranties, non-disclosure agreements, contracts, liability waivers, insurance agreements, Promotional Discount Agreements, Requests for Proposals, Responses to Requests for Proposal, Memorandums of Understanding, Letters of Interest, usage policies, or informal agreements between the city and Ring.
3. A copy of any funding opportunity announcements, grant applications and grantor status/progress reports, reports to legislative bodies, annual reports that mention Ring or the Neighbors app, as well as audit records, including

but not limited to security audits of the software, misuse reports, and reports to oversight bodies.

4. Any digital communications including but not limited to emails and text messages) as well as documents, (including but not limited to PDF, word processing, excel, and slide documents) that mention Ring or the Neighbors app.
5. Any digital communications (including but not limited to emails and text messages) with Ring representatives.

Generally, a public agency must determine within ten (10) calendar days whether a PRA request seeks copies that may be disclosed, but does not require that the records be produced within that time period. However, the PRA does require that records be made available “promptly” once a determination has been made that the agency retains records that are disclosable. See Gov. Code § 6253(b).

The City has determined that the majority of the documents you requested are disclosable. However, please note that due to the high volume of records involved, the City will require time to review the records and make any necessary redactions to the extent permitted by law.¹

The City anticipates that the documents you requested be rolled out beginning **September 16, 2019**. The remaining documents will then be released to you in “batches” until all disclosable records are provided.

The City Clerk’s office will be in contact during this process and will notify you of related costs. We thank you in advance for your patience and cooperation as the City prepares these documents for release/review.

If you have questions, please do not hesitate to contact the undersigned.

Very truly yours,
ALVAREZ-GLASMAN & COLVIN

Gloria V. Ramirez
Deputy City Attorney

cc: Lena Shumway, City Clerk
Angie Verdin, Deputy City Clerk
Norma Copado, Assistant City Attorney

¹ The City will clearly state in writing the reasons for any necessary withholdings and redactions pursuant to Gov. Code § 6255.